

Comments Regarding RM-8783, CC Docket No. 96-146,

,CG Docket No. 04-244,CC Docket No. 98-170

Submitted by NextBus Information Systems, Inc.



NextBus Information Services is a small business. We operate computer services for public transit companies that couple GPS sensors on buses and other public transit vehicles with central computers to calculate accurate and reliable predictions of exactly when transit vehicles will arrive at bus stops. Our system operates in 31 cities around America including San Francisco. In the Washington D.C. area five transit agencies already use NextBus and WMATA is considering a full scale implementation. The system can be seen at www.NextBus.com.

Transit riders love NextBus because it eliminates the frustration of unpredictable wait time. If the information can be delivered easily by phone, then riders can wait at home, or other areas of comfort and safety, sheltered from the elements and where

their time is useful, until just moments before the bus arrives, leaving for the bus stop only when they are certain to see a vehicle within one minute. Riders standing at bus stops can determine when various buses will arrive to choose the most time efficient service.



You can hear the system in operation in Oakland, California by calling 1.(510) 416-1616 and entering stop code 5301# . This will retrieve information as to when the Emery-Go-Round Shuttles will be at the Macarthur Bart Station. You will hear something like:

Advertisement

Route Powell 1 Minute

Route Hollis 4 Minutes 72 6 minutes

Route Powell 12 Minutes

Route Hollis 15 Minutes and 20 minutes

At Macarthur Bart Station.

To facilitate the implementation of the NextBus system for the benefit of riders at cash strained transit agencies NextBus seeks to generate most of its revenues from riders and advertisers rather transit agencies.

We intend a charge for NextBus telephone calls of 10¢. We are aware of no existing carrier rate plan that would allow for the collection of such a small charge by a telephone

company for our benefit. 900 number service is not acceptable.* There is a need for a billing mechanism would facilitate growth of innovative new and small businesses like NextBus without the enormous load imposed by 900 service. If that mechanism is established, extraordinarily useful information like that provided by NextBus can be provided.

We propose a class of service or number that will allow us to provide NextBus service to transit riders across America billed through local carriers. Such a number might have the following standards.

1. Cost for each connected call to be “nominal” (perhaps less than 25¢)
2. No per minute charge.
3. Maximum per month charge to any originating number regardless of number of calls. (perhaps \$5.00)
4. Carrier free to take charges off bill, information provider remedy is to stop providing information to lines refusing charges.
5. Clearly states that the caller can hang up at or before the end of the introductory message without incurring any charge whatsoever. While this feature is acceptable to NextBus, it may be considered a waste of time for transit riders who are regular users, in some instances causing a missed bus. Accordingly users could signal the system one time acknowledging expectation of a charge during future calls with the effect of eliminating the charge warning.

In the event such a service cannot be obtained we will resort to soliciting credit card numbers or other payments as provided in ¶22. However, this will greatly reduce the public’s access to our service with chilling effects on the ridership of public transit, and impose large and unnecessary costs on our company.

Specifically, we think that imposing the requirement of an “in writing” service agreement as contemplated in ¶24 is too burdensome.

For the reasons stated in 5. above we believe a requirement of a personal identification number as contemplated in ¶11 would unacceptably slow access to our information to the detriment of transit riders.

* 900/976 numbers are not acceptable because the few carriers that support 900 number service impose a service charge of at least 45¢ pushing the cost of NextBus information to the rider to 55¢. Also, we are concerned that 900 number services have become too disreputable for both content and fraud that they may be inappropriate for our kind of family service. It appears that the high base charge for 900 calls discourages regular, legitimate information uses while encouraging inappropriate uses angling for large charges.

We have no objection to charges for NextBus services being displayed separately as suggested in ¶27 provided that there is no requirement that an additional page be printed or mailed.

We would appreciate any suggestions the FCC might have for a solution to our problem. Thank you for the opportunity to comment.

Sincerely

Kenneth J. Schmier
CEO NextBus Information Systems
1321 67th Street
Emeryville, CA 94608
510.420.3101 KSchmier@NextBus.com